

18

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

COPY

Tyrone P. James
Plaintiff

V.

York County Police Department,
Agent James H. Morgan, Det. Richard
Peddicord, Det. Raymond E. Craul,
Det. Jean Fells, Det. Kessler,
C/O Baylark
Defendants.

Civil case No

1:01CV1015

FILED
SCRANTON

SEP 27 2001

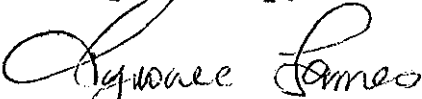
PER _____
DEPUTY CLERK

MOTION FOR APPOINTMENT OF COUNSEL

Plaintiff Tyrone P. James, an inmate in the York County Prison,
requests the court to appoint counsel for the following reasons:

- (1) Plaintiff is indigent and cannot afford counsel
- (2) Plaintiff has little experience with the law
- (3) This case is complex and requires the help of an attorney
- (4) Plaintiff have limited access to a law library, or have no
access to a person who knows law and can help him.
- (5) The ends of Justice would be served if an attorney were
appointed for this case

Respectfully,


TYRONE P. JAMES

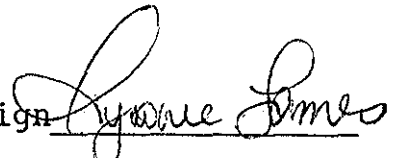
BRIEF OF SUPPORT

Plaintiff request the court to appoint an attorney to help him with the above case because:

- (1) Plaintiff is indigent and cannot afford an attorney.
 - (a) Plaintiff is disabled suffered from a mental disorder and is presently on medication; Plaintiff is seen by a psychiatrist at the York County Prison, on a monthly basis.
 - (b) Plaintiff was receiving Supplemental Security Income, before his incarceration, which was discontinued by the Social Security Administration, because of my incarceration in a institution run by the Federal, State, or Local Government, Prison.
 - (c) Plaintiff disabled cause him to be less fortunate than a normal inmate with similar legal activity.

According to American with Disabilities Act a person has a disability if he or she has a physical or mental impairment that substantially limit one or more of the major life activities of such individual, 42 U.S.S.C.12102 (2) (A).

- (2) The ends of justice would be served if an attorney were appointed for this case. For reasons given above, Plaintiff cannot received due process without the assistance of an attorney.

Sign 

TYRONE P. JAMES_
YORK COUNTY PRISON